REMARKS

This Application has been carefully reviewed in light of the Office Action mailed March 9, 2004. At the time of the Office Action, Claims 1-38 were pending in the Application. In order to advance prosecution of this case, Applicants amend Claims 1-2, 5-9, 11, 19-20, 22, 25-27, 32-34, and 36-37. Applicants cancel Claims 10, 21, and 28 without prejudice or disclaimer. Applicants add new Claims 39-47. Claims 1-9, 11-20, 22-27, and 29-47 are pending in the Application. Applicants respectfully request reconsideration and favorable action in this case.

New Claims

Applicants have amended the Application to add new Claims 39-47. Applicants respectfully contend that Claims 39-47 of the present Application are fully supported by the specification of the present Application, as originally filed. Applicants also respectfully submit that new Claims 39-47 are patentably distinct from the references cited by the Office Action.

Specifically, Claim 39 is directed to a communication system, including a central processor, a signal processor, a first communication bus forming a first path of communication between the central processor and the signal processor, and a second communication bus forming a second path of communication between the central processor and the signal processor. The central processor is operable to transmit and receive data packets using the first communication bus and to transmit and receive control packets using the second communication bus. The system also includes a plurality of wireless telephone handsets.

The signal processor of the system of Claim 39 includes a radio frequency transmitter and receiver operable to transmit first data packets and first control packets to the plurality of wireless telephone handsets, and to receive second data packets and second control packets from the plurality of wireless telephone handsets. The central processor includes a voice and data module operable to receive asynchronous data packets from an external network over a Digital Subscriber Line (DSL) connection, and convert the asynchronous data packets to synchronous data packets for transmission to the signal processor over the first communication bus, and a plurality of wireless telephone handset control modules, each operable to control, at least partially, the operation of a respective one of the plurality of wireless telephone handsets.

Each of the plurality of wireless telephone handset control modules include a wireless telephone handset subroutine library operable to define a plurality of commands associated with subroutines available to at least one of the plurality of wireless telephone handsets, and a script module operable to: define a plurality of states available to at least one of the plurality

of wireless telephone handsets, define a plurality of subroutines available to at least one of the plurality of wireless telephone handsets, and determine the content of the first control packets such that the first control packets include control information corresponding with at least one of the states or subroutines.

The central processor also includes a wireless telephone handset attribute repository coupled with the wireless telephone handset control modules, wherein the wireless telephone handset attribute repository is operable to store attributes associated with at least one of the plurality of wireless telephone handsets, and a wireless telephone handset behavior script database coupled with the wireless telephone handset control modules, wherein the wireless telephone handset behavior script database is operable to store a plurality of subroutines available to at least one of the plurality of wireless telephone handsets. The plurality of wireless telephone handsets each include a printed circuit board and a handset processor coupled with the printed circuit board, the handset processor operable to receive the first control packets from one of the plurality of wireless telephone handset control modules.

The Office Action cited U.S. Patent No. 5,475,681 issued to White et al. ("_White_") and U.S. Patent No. 5,463,616 issued to Kruse et al. ("_Kruse_"). Neither _White_ nor _Kruse_, alone or in combination, disclose, teach, or suggest each element of Claim 39.

Specifically, the cited references do not disclose a first communication bus forming a first path of communication between the central processor and the signal processor, and a second communication bus forming a second path of communication between the central processor and the signal processor. The references also do not disclose a plurality of wireless handsets, or a signal processor including a radio frequency transmitter and receiver operable to transmit first data packets and first control packets to the plurality of wireless telephone handsets, and to receive second data packets and second control packets from the plurality of wireless telephone handsets.

The cited references do not disclose, teach, or suggest a central processor including a voice and data module operable to receive asynchronous data packets from an external

network over a Digital Subscriber Line (DSL) connection, and convert the asynchronous data packets to synchronous data packets for transmission to the signal processor over the first communication bus. Further, the cited references do not disclose the central processor including a plurality of wireless telephone handset control modules, each operable to control at least partially the operation of a respective one of the plurality of wireless telephone handsets.

The references relied upon by the Office Action also do not disclose the central processor including a wireless telephone handset attribute repository coupled with the wireless telephone handset control modules, wherein the wireless telephone handset attribute repository is operable to store attributes associated with at least one of the plurality of wireless telephone handsets, and a wireless telephone handset behavior script database coupled with the wireless telephone handset control modules, wherein the wireless telephone handset behavior script database is operable to store a plurality of subroutines available to at least one of the plurality of wireless telephone handsets.

Neither *White* nor *Kruse*, alone or in combination, disclose, teach, or suggest each of the plurality of wireless telephone handset control modules including a wireless telephone handset subroutine library operable to define a plurality of commands associated with subroutines available to at least one of the plurality of wireless telephone handsets, and a script module operable to: define a plurality of states available to at least one of the plurality of wireless telephone handsets, define a plurality of subroutines available to at least one of the plurality of wireless telephone handsets, and determine the content of the first control packets such that the first control packets include control information corresponding with at least one of the states or subroutines.

Lastly, the cited references do not disclose that the central processor also includes a wireless telephone handset attribute repository coupled with the wireless telephone handset control modules, wherein the wireless telephone handset attribute repository is operable to store attributes associated with at least one of the plurality of wireless telephone handsets, and a wireless telephone handset behavior script database coupled with the wireless telephone

handset control modules, wherein the wireless telephone handset behavior script database is operable to store a plurality of subroutines available to at least one of the plurality of wireless telephone handsets. The plurality of wireless telephone handsets each include a printed circuit board and a handset processor coupled with the printed circuit board, the handset processor operable to receive the first control packets from one of the plurality of wireless telephone handset control modules. For at least these reasons, Applicants respectfully submit that neither *White* nor *Kruse*, alone or in combination, disclose, teach, or suggest Claim 39.

Claim Objections

The Office Action objected to Claims 1, 9, 10, 11, 20, 21, 25, 26, 27, 28, 33, 34, 36 and 37 because of informalities. Claims 10, 21, and 28 have been cancelled. The remainder of the claims have been amended to correct the informalities.

Specification Objections

The Office Action objected to the specification on page 18, line 18 for informalities. Pursuant to the request of the Examiner, Applicants amend the specification by adding the previously missing Patent number.

Section 112 Rejections

The Office Action rejects Claims 8 and 19 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. While Applicants do not agree with the Office Action's characterization of Claims 8, and 19, Applicants have amended Claims 8 and 19 to advance prosecution of the present Application.

Section 102 Rejections

The Office Action rejects Claims 1-7, 11-18, 22-24, 26-27, 29-32, and 36-38 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,475,681 issued to White et al. ("_White_"). Applicants respectfully traverse these rejections for the reasons stated below.

To anticipate a claim, each and every limitation must be found in a reference. Claim 1 is directed to a communication system, including a central processor, a signal processor, and first and second communication buses forming first and second paths of communication between the central processor and the signal processor. The central processor is operable to transmit and receive data packets using the first communication bus, and to transmit and receive control packets using the second communication bus. The portions of the cited references relied upon by the Office Action do not disclose each of these limitations.

White discloses a microprocessor bus 103 coupling the network interface 105 to the control processor 107. _See, White_ Column 4, Lines 54-55; Figure 1, Reference 103. _White_ does not disclose first and second communication buses forming first and second paths of communication between the central processor and the signal processor as delineated in Claim 1. _White_ also does not disclose a central processor operable to transmit and receive data packets using the first communication bus, and to transmit and receive control packets using the second communication bus. For at least these reasons, Applicants respectfully submit that Claim 1 is not anticipated by _White_, and request that the rejection of Claim 1 under _White_ be withdrawn.

Claims 2, and 5-7 depend from, and incorporate all the limitations of, independent Claim 1. Therefore, Applicants respectfully submit that Claims 2, and 5-7 are patentable over the cited art, for example, for the same reasons discussed above with regard to Claim 1.

Claims 3 and 4 have been rewritten in independent form and are otherwise unamended. Claims 3 and 4 are directed to a communication system, including a central processor operable to transmit data packets and control packets, a transmit/receive module operable to receive the data packets and the control packets and transmit the data packets and

control packets to one of a plurality of terminal units, and a communication bus coupling the central processor to the transmit/receive module for communication of the data packets and the control packets. The system also includes a plurality of terminal unit control modules coupled with the central processor, each terminal unit control module operable to control at least partially the operation of a respective one of the plurality of terminal units, and a script module coupled with at least one of the terminal unit control modules, wherein the script module is operable to determine the content of the control packets. The portions of the cited references relied upon by the Office Action do not disclose each of these limitations.

White discloses a LAN control 113, a phone control 119, and a radio control 125. *See, White* Figure 1. *White* does not disclose a script module coupled with at least one of the terminal unit control modules, wherein the script module is operable to determine the content of the control packets, as delineated in Claims 3 and 4. For at least these reasons, Applicants respectfully submit that Claims 3 and 4 are not anticipated by *White*, and request that the rejection of Claim 1 under *White* be withdrawn.

Claim 11 is directed to a communication system, including a central processor operable to transmit data packets and control packets, and a signal processor operable to receive the data packets and the control packets and transmit the data packets and control packets to one of a plurality of terminal units. The system also includes a first communication bus forming a path of communication between the central processor and the signal processor for communication of the data packets, and a second communication bus forming a path of communication between the central processor and the signal processor for communication of the control packets. The portions of the cited references relied upon by the Office Action do not disclose each of these limitations.

As discussed above with regard to Claim 1, *White* does not disclose a first communication bus forming a path of communication between the central processor and the signal processor for communication of the data packets, and a second communication bus forming a path of communication between the central processor and the signal processor for communication of the control packets as delineated in Claim 11. For at least these reasons,

Applicants respectfully submit that Claim 11 is not anticipated by *White*, and request that the rejection of Claim 11 under *White* be withdrawn.

Claims 12-18 depend from, and incorporate all the limitations of, independent Claim 11. Therefore, Applicants respectfully submit that Claims 12-18 are patentable over the cited art, for example, for the same reasons discussed above with regard to Claim 11.

Claim 22 is directed to a terminal unit, including a printed circuit board disposed within the terminal unit, and a processor coupled with the printed circuit board, the processor operable to receive control packets from one of a plurality of terminal unit control modules associated with a communication system. The portions of the cited references relied upon by the Office Action do not disclose each of these limitations.

White discloses a network interface integrated circuit. *See, White* Figure 1, Reference 109. *White* does not disclose a printed circuit board disposed within the terminal unit or a processor coupled with the printed circuit board, the processor operable to receive control packets from one of a plurality of terminal unit control modules associated with a communication system as delineated in Claim 22. For at least these reasons, Applicants respectfully submit that Claim 22 is not anticipated by *White*, and request that the rejection of Claim 22 under *White* be withdrawn.

Claims 23-24 depend from, and incorporate all the limitations of, independent Claim 22. Therefore, Applicants respectfully submit that Claims 23-24 are patentable over the cited art, for example, for the same reasons discussed above with regard to Claim 22.

Claim 26 is directed to a method including transmitting first control packets from a first terminal unit control module coupled with a central processor to a signal processor over a first communication bus, wherein the first communication bus forms a first path of communication between the central processor and the signal processor, and transmitting data packets from the central processor to the signal processor over a second communication bus, wherein the second communication bus forms a second path of communication between the central processor and the signal processor. The portions of the cited references relied upon by the Office Action do not disclose each of these limitations.

As discussed above with regard to Claim 1, *White* does not disclose a first communication bus forming a first path of communication between the central processor and the signal processor, and a second communication bus forming a second path of communication between the central processor and the signal processor as delineated in Claim 26. For at least these reasons, Applicants respectfully submit that Claim 26 is not anticipated by *White*, and request that the rejection of Claim 26 under *White* be withdrawn.

Claim 36 contains similar limitations to Claim 26, and Claims 27, 29-32, and 37-38 depend from, and incorporate all the limitations of, allowable independent claims. Therefore, Applicants respectfully submit that Claims 27, 29-32, and 36-38 are patentable over the cited art, for example, for the same reasons discussed above with regard to Claim 26.

Section 103 Rejections

The Office Action rejects Claims 33-35 under 35 U.S.C. § 103(a) as being unpatentable over *White et al.* Applicants respectfully traverse these rejections for the reasons stated below.

In order to establish a *prima facie* case of obviousness of a claimed invention, all claim limitations must be taught or suggested by the prior art. *In re Royka,* 490 F.2d 981 (CCPA 1974).

Claim 33 is directed to a computer readable medium encoded with a computer program operable to transmit first control packets from a first terminal unit control module coupled with a central processor to a signal processor over a first communication bus, wherein the first communication bus forms a first path of communication between the central processor and the signal processor, and transmit data packets from the central processor to the signal processor over a second communication bus, wherein the second communication bus forms a second path of communication between the central processor and the signal processor. The portions of the cited reference relied upon by the Office Action do not disclose, teach, or suggest each of these limitations.

White discloses a microprocessor bus 103 coupling the network interface 105 to the control processor 107. *See, White* Column 4, Lines 54-55; Figure 1, Reference 103. *White* does not disclose a first communication bus forming a first path of communication between the central processor and the signal processor, and a second communication bus forming a second path of communication between the central processor and the signal processor as delineated in Claim 33. For at least these reasons, Applicants respectfully submit that *White* does not disclose, teach, or suggest Claim 33 and request that the rejection of Claim 33 under *White* be withdrawn.

Claims 34-35 depend from, and incorporate all the limitations of, independent Claim 33. Therefore, Applicants respectfully submit that Claims 34-35 are patentable over the cited art, for example, for the same reasons discussed above with regard to Claim 33.

The Office Action rejects Claims 9, 20, and 25 under 35 U.S.C. § 103(a) as being unpatentable over *White et al.* in view of U.S. Patent No. 5,463,616 issued to Kruse et al. ("*Kruse*"). Applicants respectfully traverse these rejections for the reasons stated below.

Claim 9 depends from independent Claim 1. As discussed above with regard to Claim 1, *White* does not disclose first and second communication buses forming first and second paths of communication between the central processor and the signal processor. *White* also does not disclose a central processor operable to transmit and receive data packets using the first communication bus, and to transmit and receive control packets using the second communication bus. Further, these elements are not disclosed, taught, or suggested by the cited portions of *Kruse*. For at least these reasons, Applicants respectfully submit that neither *White* nor *Kruse*, alone or in combination, disclose, teach, or suggest Claim 9 and request that the rejection of Claim 9 be withdrawn.

Claim 20 depends from independent Claim 11. As discussed above with regard to Claim 11, *White* does not disclose a first communication bus forming a path of communication between the central processor and the signal processor for communication of the data packets, and a second communication bus forming a path of communication between the central processor and the signal processor for communication of the control packets. Further, these elements are not disclosed, taught, or suggested by the cited portions of *Kruse*. For at least these reasons, Applicants respectfully submit that neither *White* nor *Kruse*, alone or in combination, disclose, teach, or suggest Claim 20 and request that the rejection of Claim 20 be withdrawn.

Claim 25 depends from independent Claim 22. As discussed above with regard to Claim 22, *White* does not disclose a printed circuit board disposed within the terminal unit or a processor coupled with the printed circuit board, the processor operable to receive control packets from one of a plurality of terminal unit control modules associated with a communication system. Further, these elements are not disclosed, taught, or suggested by the cited portions of *Kruse*. For at least these reasons, Applicants respectfully submit that neither

White nor *Kruse*, alone or in combination, disclose, teach, or suggest Claim 25 and request that the rejection of Claim 25 be withdrawn.
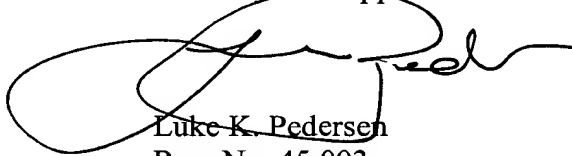
Conclusions

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending Claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicants stands ready to conduct such a conference at the convenience of the Examiner.

A check in the amount of $366.00 is attached to cover the fee for additional claims. No other fees are believed to be due, however, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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